Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of	)	
	)	
Service Rules for the 698-746, 747-762 and 777-792 MHz Bands	)	WT Docket No. 06-150
	)	
	)	
Implementing a Nationwide, Broadband, Interoperable Public Safety Network in the 700 MHz Band	)	PS Docket No. 06-229
	)	
	)	
Amendment of Part 90 of the Commission's Rules	)	WP Docket No. 07-100
	)	

COMMENTS OF THE LOS ANGELES REGIONAL INTEROPERABLE COMMUNICATIONS SYSTEM AUTHORITY

I. INTRODUCTION

The Los Angeles Regional Interoperable Communications System ("LA-RICS" or "System") Authority hereby submits the following comments in response to the Fourth Further Notice of Proposed Rulemaking ("FNPRM") released by the Federal Communications Commission ("FCC" or "Commission") on January 26, 2011 in the above-referenced proceedings.[1] The Commission seeks comments on additional proposed rules to further promote and enable nationwide interoperability among public safety broadband networks operating in the 700 MHz band.

II. LA-RICS BACKGROUND

The LA-RICS project is a collaborative effort of law enforcement, fire service, and health service professionals with elected and appointed officials working towards the

[1] *Service Rules for the 698-746, 747-762 and 777-792 MHz Bands, Implementing a Nationwide, Broadband, Interoperable Public Safety Network in the 700 MHz Band, Amendment of Part 90 of the Commission's Rules*, Third Report and Order and Fourth Further Notice of Proposed Rulemaking, 26 FCC Rcd 733 (2011) ("*FNPRM*").

goal of providing a single, unified voice and data communication platform for all regional public safety agencies. A Joint Powers Authority ("JPA" or "Authority") has been established for the LA-RICS project to engage in regional and cooperative planning and coordination of governmental services to establish this region-wide interoperable public safety communications network. When completed, LA-RICS will cover over 4000 miles of diverse terrain and serve over 34,000 first responders working across 85 separate local agencies.

LA-RICS will incorporate both a land mobile radio ("LMR") system and a wireless broadband data system. The LMR system is a P25 digital, trunked system. The data system will be built using long-term evolution ("LTE") wireless standards and utilize spectrum in the 700 MHz band. The new system will allow interagency coordination and response to routine, emergency and catastrophic events.

III. COMMENTS ON SPECIFIC ISSUES RAISED IN THE FNPRM

A. Definition of Interoperability (FNPRM ¶16)

The Authority strongly agrees with the Commission's proposal to amend the definition of interoperability in Part 90 of the Commission Rules to harmonize it with the Department of Homeland Security ("DHS") Office of Interoperability and Compatibility ("OIC") definition of "the ability of public safety agencies to talk to one another via radio communication systems- to exchange voice and/or data with one another on demand, in real time, when needed and when authorized." With over 85 member agencies, LA-RICS will provide voice and data communication to a multi-discipline and multi-agency user base. The DHS definition more accurately expresses the goal of interoperability as the ability to communicate with one another may require several levels of communication in

a multi-disciplinary setting for any given moment. The DHS definition captures the true purpose of interoperability for different agencies and jurisdiction to exchange voice and data information wirelessly on demand, in real time, with appropriate security and priority. In addition, the Authority believes that the DHS definition should also be applied to narrowband communications to provide consistency.

B. Architectural Framework and Guiding Principles (FNPRM ¶¶17-19)

To achieve a nationwide interoperable broadband network, common characteristics are necessary to serve as a baseline. The Authority supports common characteristics so long as such characteristics take into account each region's interest in operating its portion of the nationwide network and various types of business models. The composition and structure for agencies across the nation are vastly different. For example, LA-RICS provides a modern, integrated voice and data system for over 34,000 first responders in an area over 4,000 square miles of widely diverse mountains, deserts, coastlines, and urban areas. The network architecture for LA-RICS may involve scenarios that may not be shared across the nation.

As such, the Authority strongly believes that there should be flexibility in the architectural framework of the public safety network that takes into account the local needs of public safety and various business models while enabling technology to evolve and keep pace with the competitive commercial marketplace. The Commission should maintain its traditional role as a regulatory body and not take the lead on the technical and operational aspects of interoperability. Public safety entities and network operators are better suited to address the network architectural and engineering requirements. The

Authority supports a nationwide network governing entity, working directly with public safety entities, to address evolving architectural, technical and operational aspects.

However, the Authority recognizes the significance of adopting certain basic requirements and supports the Commission's proposal to adopt the requirement that all networks on the public safety broadband spectrum support an all-IP LTE technology platform, particularly 3GPP standard, Universal Terrestrial Radio Access ("E-UTRA"), Release 8 ("LTE"), and associated Evolved Packet Core ("EPC"), as well as, certain LTE interfaces to ensure interoperability. The Authority also agrees with the Commission that backwards compatibility is essential if the network is to be fully interoperable across the nation.

C. Mission Critical Voice (FNPRM ¶20)

The Authority supports the Commission's proposal that the network must become capable of supporting both mission-critical voice and data communications, however, the Commission should not adopt regulations on mission-critical voice until standards and issues are evaluated and resolved.

D. System Identifiers (FNPRM ¶¶32-34)

The Authority believes that the Commission at this time should not regulate the PLMN IDs as there are operational considerations that still need to be analyzed and evaluated. However, of the proposals provided by the Commission, the Authority supports a hybrid scheme in which one separate PLMN ID would be assigned to each regional or tribal network and a single PLMN ID would be assigned to the overall nationwide network.

E. Roaming Configurations (FNPRM ¶¶32-34)

The Authority supports efforts by the Commission to better enable public safety agencies to enter voluntary roaming agreements with commercial operators. However, local public safety representatives should be able to choose their roaming partners after addressing operability, interoperability and cost implications. Such decisions need review by the local operators and the Commission should not adopt regulations that inhibit an operator's ability to enter into partnership agreements with commercial carriers that provides benefits applicable to that network operator.

F. Section 337 Eligible Users (FNPRM ¶¶134-140)

The LA-RICS Authority strongly urges the Commission to re-examine its tentative conclusion in regards to eligible users as governed by Section 337 of the Communications Act. The Commission tentatively concluded that utility and critical infrastructure entities are not eligible for use of the public safety spectrum. This conclusion does not support the mission critical functions of public safety that include utilities and critical infrastructure entities. Catastrophic events require the participation of utilities and critical infrastructure entities, along with police, fire and EMS in order to respond to and recover from emergency events. Secondary responders are essential in supporting response efforts, as well as recovery efforts.

First responders in the Los Angeles region work closely with secondary responders during emergencies, such as wildfires, civil unrest and natural and manmade disasters. Several times during the 2009-2010 rainy season, the Los Angeles County Department of Public Works responded to the La Crescenta Valley area to assist first responders with gaining access to mountain roads that had been covered in debris due to mudslides. A unified command was formed with the California Highway Patrol, City of Los Angeles

Fire Department, City of Los Angeles Department of Water and Power, Los Angeles County Public Works, and the Los Angeles County Sheriff and Fire Departments. All agencies worked closely together to keep residents safe and maintain access to the affected neighborhoods. If secondary users are not permitted to use the public safety spectrum, response to emergencies will be critically impaired.

IV. GENERAL COMMENTS AND CONCLUSION

The Authority acknowledges the Commission's effort in developing baseline guidelines and principles to ensure an effective technical framework for the nationwide interoperable public safety broadband network. While the Authority supports establishing minimum technical requirements to achieve interoperability, it urges the Commission to minimize regulatory actions at this stage as it will impede the pioneering efforts of the early public safety broadband network builders. The Waiver Recipients are actively vetting and analyzing standards and requirements that best support the goal of achieving an interoperable broadband network. The Commission should maintain its traditional regulatory role and should defer technical requirements for operational and interoperability standards to public safety organizations, such as the Public Safety Spectrum Trust ("PSST"), Public Safety Broadband Licensee ("PSBL"), National Public Safety Telecommunications Council ("NPSTC"), public safety network operators or a nationwide network governing entity.

Respectfully Submitted,

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